CITY OF MURRIETA

May 10, 2006

Mr. Jonathan Nadler
SCAG
Transportation Conformity Working Group
818 W. Seventh Street, 12th Floor (Main Building)
Los Angeles, CA 90017

Subject: **Interstate 15/California Oaks Road Interchange Improvements (EA 0A490)-Particulate Matter $PM_{2.5}$ Conformity**

Dear Mr. Nadler:
The City of Murrieta (City), in partnership with the California Department of Transportation – District 08 (Department and) the Federal Highway Administration (FHWA), proposes improvements to the existing Interstate 15/California Oaks Road Interchange. The project proposes a modified Department Type L-9 partial cloverleaf interchange with new loop entrance ramps and new traffic signals at Kalmia Street/ Madison Avenue/ I-15 southbound ramps and at California Oaks Road/I-15 northbound ramps. The southbound loop ramp will be designed as a two-lane "D" type ramp with an high occupancy vehicle (HOV) preferential lane, tapering down to one lane at the gore nose. The northbound loop ramp will be designed as a two-lane loop ramp with an HOV preferential lane, tapering down to one lane at the gore nose. The exit ramps will require realignment around the proposed loop ramps and widening at their intersections with California Oaks Road. California Oaks Road will be widened to six travel lanes with dual left turn lanes. Additional improvements include lowering California Oaks Road beneath the I-15 undercrossing to allow for a standard temporary vertical clearance of 4.6 meters (m) (15.1-feet [ft]) and construction of tie-back retaining walls at the back of sidewalk to accommodate the widening without disturbing the existing structure. This design will handle existing and future planned traffic volumes for the design year 2030.

Project components identified below are proposed to provide the necessary improvements:

- New loop entrance ramps will be provided for both northbound and southbound directions of I-15. These ramps provide a HOV preferential lane that transition to one lane prior to the gore nose. CHP enforcement areas/ Maintenance Vehicle Pullouts (MVP) are provided for both loop ramps.

- Existing I-15 northbound and southbound exit ramps will be relocated and widened at their connection to California Oaks Road.

- Transitions for eastbound and westbound turn pockets to California Oaks Road will be provided on the northbound and southbound exit ramps.

- California Oaks Road will be widened to six travel lanes (three (3) 3.6 m (11.81 ft) lanes in each direction) with a 3.85 m (12.63 ft) center median, 2.4 m (7.87 ft) outside shoulders/ Class II bicycle lanes, and 1.8 m (5.90 ft) sidewalks on both sides. The existing retaining walls under the California Oaks Undercrossing will be removed and new tie-back walls will be constructed to facilitate the widening.

- A portion of Madison Avenue, south of California Oaks Road will be improved to provide two (2) 3.6 m (11.81 ft) southbound travel lanes, dual right turn pockets (3.6 m [11.81 ft] each) to eastbound California Oaks with one being an optional through lane to serve as a direct entrance to southbound I-15, and one (1) 3.6-meter left turn pocket.

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It is anticipated that this project will improve the level of service (LOS) at the intersections within the project limits from their anticipated LOS without the project in the year 2030.

On March 10, 2006, the U.S. Environmental Protection Agency (EPA) published a final rule that establishes the transportation conformity criteria and procedures for determining which transportation projects must be analyzed for local air quality impacts in $PM_{2.5}$ and PM_{10} non-attainment and maintenance areas (71 Federal Register [FR] 12458). Transportation conformity is required under Clean Air Act section 176(c) 42 United States Code (U.S.C.) 7506(c) to ensure that federally supported highway and transit project activities are consistent with ("conform to") the purpose of the state quality implementation plan (SIP). EPA's transportation conformity rule (40 Code of Federal Regulations [CFR] 51.390 and Part 93) establishes the criteria and procedures for determining whether transportation activities conform to the SIP. Clean Air Act section 176(c)(1)(B) is the statutory criterion that must be met by all projects in non-attainment and maintenance areas that are subject to transportation conformity. Section 176(c)(1)(B) states that federally-supported transportation projects must not "cause or contribute to any new violation of any standard in any area; increase the frequency or severity of any existing violation of any standard in any area; or delay timely attainment of any standard or any required interim emission reductions or other milestones in any area."

To meet statutory requirements, the March 10, 2006 final rule requires $PM_{2.5}$ and PM_{10} hot-spot analyses to be performed for projects of air quality concern. Qualitative hot-spot analyses would be done for these projects before appropriate methods and modeling guidance are available and quantitative $PM_{2.5}$ and PM_{10} hot-spot analyses are required under 40 CFR 93.123(b)(4). In addition, through the final rule, EPA determined that projects not identified in 40 CFR 93.123(b)(1) as projects of air quality concern have also met statutory requirements without any further hot-spot analyses (40 CFR 93.116(a)). The final rule defines the projects of air quality concern that require a $PM_{2.5}$ and PM_{10} hot-spot analysis in 40 CFR 93.123(b)(1) as:[1]

(i) New or expanded highway projects that have a significant number of or significant increase in diesel vehicles;

(ii) Projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project;

(iii) New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location;

(iv) Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location; and

(v) Projects in or affecting locations, areas, or categories of sites which are identified in the $PM_{2.5}$ or PM_{10} applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.

[1] U.S. Environmental Protection Agency and Federal Highway Administration, *Transportation Conformity Guidance for Qualitative Hot-Spot Analyses in PM_{10} and $PM_{2.5}$ Nonattainment and Maintenance Areas*, (PM_{10} Protocol), March 2006, Appendix A.

Conformity determinations require the analysis of direct and indirect emissions associated with the proposed project and compare them to the without project condition. If the total of direct and indirect emissions from the project reaches or exceeds regionally significant thresholds, the Lead Agency must perform a conformity determination to demonstrate the positive conformity of the federal action.

The project is programmed within the Southern California Association of Governments (SCAG) adopted *2004 Regional Transportation Improvement Program* (RTIP) for fiscal year FY 2004/05-2007/08 as a State Highway Project:

#RIV010204: IN MURRIETA AT I-15/CALIFORNIA OAKS/KALMIA ST IC – RECONFIGURE RAMPS (CONSTRUCT NB/SB LOOP ON RAMPS, RELOCATE SB OFFRAMP), WIDEN CAL OAKS 4 TO 6 LNS FROM UC TO CAL OAKS PLAZA

Additionally, the project is programmed within the SCAG adopted 2004 Regional Transportation Plan (RTP). Therefore, the proposed project is in conformance with the SIP.

The proposed improvements will improve local circulation and access to a predominantly commercial area in the City. Without implementation of the proposed improvements, California Oaks Road through the interchange area is forecast to operate at deficient LOS levels. It should be noted that California Oaks does not currently nor is forecast to experience traffic volumes in excess of 125,000 average daily trips (ADT). Year 2030 intersection volumes in the vicinity range from 27,100 to 66,900 vehicles per day. Additionally, the total volume of heavy truck and diesel traffic is expected to be well below 8 percent of the total ADT.

Based upon the information provided above, the project is not expected to introduce significant amounts of diesel truck traffic and is *not considered a project of significant concern* per the definition contained within 40 CFR 93.123(b)(1). Thus, a less than significant impact with respect to $PM_{2.5}$ and PM_{10} would occur

The Draft Categorical Exclusion (CE) and supporting technical studies have been approved for release to FHWA pending receipt of a preliminary proposal relative to the treatment of the new $PM_{2.5}$ requirement. The City respectfully requests SCAG's consideration and acceptance of this letter as formal validation of the project's insignificant contribution of $PM_{2.5}$. SCAG concurrence with this request will allow the Department to submit the Draft CE and this letter documenting the project's $PM_{2.5}$ conformity to FHWA for review.

Sincerely,
CITY OF MURRIETA

Roger S. Cunliffe-Owen, P.E.
Contract Consulting Engineer
Project Manager

Cc: Gary Warkentin – RBF